

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**TIMOTHY TRIGG
ANGELA TRIGG**

PLAINTIFFS

VERSUS

CIVIL ACTION NO. 3:18-cv-00067

**PLATINUM LEVEL TRANSPORT, INC.;
ENTIMO E. CORADO MERIDA
and JOHN DOES 1-5**

DEFENDANTS

NOTICE OF EXTENSION OF TIME TO FILE ANSWER

COME NOW the Plaintiffs, Timothy Trigg (“Tim”) and Angela Trigg (“Angela”) (hereinafter collectively referred to as “Plaintiffs”) through their counsel of record, and file this their Notice of Extension of Time to File Answer and, in support thereof, would show unto the Court the following:

1. Plaintiffs filed their Complaint against Defendants Platinum Level Transport, Inc. and Entimo E. Corado Merida on February 27, 2018. [Doc. 1]. Summons were issued and served upon the Texas Secretary of State and returns of service were received on March 9, 2018, making Defendants’ Answers due on March 30, 2018.
2. Steven Lyens, an adjuster with Global Hawk Insurance Company, the insurer of the Defendants, called the undersigned on Friday, April 6, 2018, and stated that he had only recently become aware that a lawsuit had been filed against his insureds, and requested a forty-five (45) day extension of time to file an Answer to Plaintiffs’ Complaint in order for him to investigate the allegations within the Complaint and retain counsel.
3. The undersigned advised that he had no objection to such an extension and would so

notify the Court.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs hereby request that this Court enter an order granting Defendants an additional forty-five (45) days to file an Answer to Plaintiffs' Complaint.

Respectfully submitted this the 9th day of April, 2018.

**TIMOTHY TRIGG and ANGELA TRIGG,
Plaintiffs**

/s/ P. Manion Anderson
ALEJANDRO ACOSTA, TXB# 24064789
SAMUEL S. McHARD, TXB# 24095103
P. MANION ANDERSON, Admitted *Pro hac vice*

SAMUEL S. McHARD, TXB# 24095103
P. MANION ANDERSON, MSB# 104250, Admitted *Pro hac vice*
McHARD, McHARD, ANDERSON & ASSOCIATES, PLLC
140 Mayfair Road, Suite 1500
Hattiesburg, MS 39402
Ph: (601) 450-1715
Fx: (601) 451-1719
Em: smchard@mchardlaw.com
manderson@mchardlaw.com

ALEJANDRO ACOSTA, TXB# 24064789
FLORES, TAWNEY & ACOSTA, P.C.
801 Myrtle Ave, Suite 100
El Paso, TX 79901
Ph: (915)308-1000
Fx: (915)300-0283
Em: aacosta@ftalawfirm.com

CERTIFICATE OF SERVICE

I do hereby certify that I electronically filed the foregoing with the Clerk of court using the CM/ECF system, which will send notification of such filing to all counsel of record.

THIS the 9th day of April, 2018.

/s/ P. Manion Anderson
COUNSEL OF RECORD